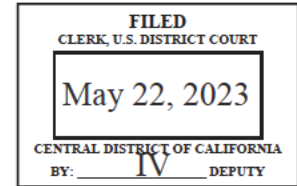


1 E. MARTIN ESTRADA
United States Attorney
2 MACK E. JENKINS
Assistant United States Attorney
3 Chief, Criminal Division
JAMES C. HUGHES (Cal. Bar No. 263878)
4 Assistant United States Attorney
Major Frauds Section
5 1100 United States Courthouse
312 North Spring Street
6 Los Angeles, California 90012
Telephone: (213) 894-2579
7 Facsimile: (213) 894-6269
E-mail: James.Hughes2@usdoj.gov



8 Attorneys for Applicant
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 LIJUAN CHEN,
aka "Angela Chen",
16 Defendant.
17

No. 2:23-mj-02644

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING DOCUMENTS;
DECLARATION OF JAMES C. HUGHES

(UNDER SEAL)

18 The government applies ex parte for an order directing that the
19 the application for the complaint, arrest warrant, and all
20 attachments thereto, as well as this ex parte application, the
21 declaration of James C. Hughes, and this Court's sealing order, and
22 all documents subsequently filed under this same case number until
23 such time as until the defendant is taken into custody on the charge
24 contained in the complaint and the government files a "Report
25 Commencing Criminal Action" in this matter, or until the government
26 determines that these materials are subject to its discovery
27 obligations in connection with criminal proceedings, at which time
28 they may be produced to defense counsel. The government also

1 requests that the government be permitted to disclose the complaint
2 and affidavit as permitted or required by law.

3 This ex parte application is based on the attached memorandum
4 declaration of James C. Hughes, and the records and files in this
5 case, including the application for complaint, arrest warrant, and
6 attachments thereto.

7 Dated: May 22, 2023

Respectfully submitted,

8 E. MARTIN ESTRADA
United States Attorney

9 MACK E. JENKINS
10 Assistant United States Attorney
11 Chief, Criminal Division

12 /s/ James C. Hughes
13 JAMES C. HUGHES
Assistant United States Attorney
14 Major Frauds Section

15 Attorneys for Applicant
UNITED STATES OF AMERICA
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DECLARATION OF JAMES C. HUGHES

I, JAMES C. HUGHES, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the investigation of this matter, in which the government has submitted an affidavit in support of a complaint and arrest warrant.

2. The target subject of the proposed complaint, LIJUAN CHEN aka "Angela Chen" ("defendant"), is not in federal custody and has not been informed that she could be charged in a federal case. The government continues to investigate this case to identify other co-conspirators and that investigation could be compromised if the criminal complaint in this case were made publicly available before defendant is taken into custody.

3. Further, public disclosure of the complaint and arrest warrant or the information in the warrant application could seriously jeopardize other aspects of the investigation, which is ongoing, and may cause co-conspirators to flee, result in the destruction of or tampering with evidence beyond the scope of the warrant, or cause intimidation of potential witnesses.

4. Accordingly, the government requests that the complaint and affidavit, as well as this ex parte application, this declaration, and this Court's sealing order, be kept under seal until the defendant is taken into custody on the charge contained in the complaint and the government files a "Report Commencing Criminal Action" in this matter, or until the government determines that these materials are subject to its discovery obligations in connection with criminal proceedings, at which time they may be

1 produced to defense counsel. The government also requests that the
2 government be permitted to disclose the complaint and affidavit as
3 permitted or required by law.

4 I declare under penalty of perjury under the laws of the United
5 States of America that the foregoing is true and correct and that
6 this declaration is executed at Los Angeles, California, on May 22,
7 2023.



JAMES C. HUGHES